

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)	
)	
Plaintiff)	
v.)	Case No. PJM 08 cv 0921
)	
WORLD AVENUE USA, LLC, et al.)	
Defendants)	
_____)	

**WORLD AVENUE USA, LLC’S MOTION FOR EXTENSION
OF TIME TO COMPLY WITH COURT ORDER**

Defendant World Avenue USA, LLC. (“WAUSA”), by and through undersigned counsel, moves this Honorable Court for an extension of time to comply with the Court’s Order (DE 428), and as grounds therefore states as follows:

1. On September 23, 2010, this Court ordered both parties to supplement all discovery, and to certify all discovery responses as complete and accurate. DE 428. The time to respond was extended to October 14, 2010. DE 434.

2. Due to the prolixity of the discovery materials propounded by Plaintiff Beyond Systems, Inc. (“BSI”), Defendant WAUSA must review the accuracy of over a hundred pages of discovery responses as well as certify that thousands of pages are compliant with the discovery responses. Unlike BSI, WAUSA does not routinely engage in litigating these matters, and must respond to each request on a case-by-case basis. WAUSA is in the process of supplementing its documents and discovery responses, but does require additional time to certify that such responses are complete, or to produce additional discovery.

3. Accordingly, WAUSA requires an extension of time until Monday, October 25, 2010 to complete its obligations.

4. Counsel for WAUSA has requested the extension from BSI, but counsel for BSI has refused to give the extension.

WHEREFORE, Defendant WAUSA respectfully requests the Court grant an extension of time to Monday, October 25, 2010 to supplement all discovery, and to certify all discovery responses as complete and accurate as ordered by this Court on September 23, 2010. (DE 428)

Respectfully submitted,
Attorneys for World Avenue USA, LLC

/s/John L. McManus

Sanford M. Saunders, Jr., Esq.

USDC, MD #4734

saunderss@gtlaw.com

Nicoleta Burlacu, Esq.

BurlacuN@gtlaw.com

Admitted Pro Hac Vice

GREENBERG TRAURIG, LLP

2101 L Street, NW, Suite 1000

Washington, DC 20037

Telephone: 202-331-3100

Facsimile: 202-331-3101

--and--

Kenneth Horky, Esq.

Florida Bar No. 691194

horkyk@gtlaw.com

John L. McManus, Esq.

Florida Bar No. 0119423

mcmanusj@gtlaw.com

Admitted Pro Hac Vice

GREENBERG TRAURIG, P.A.

401 East Las Olas Boulevard, Suite 2000

Fort Lauderdale, FL 33301

Telephone: 954-765-0500

Facsimile: 954-765-1477